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February 3, 2023

VIA ECF

Hon. Colleen McMahon, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 24A  
New York, NY 10007

MEMO ENDORSED

Conference adjourned to  
3/9/2023 @ 10:30 AM

Re: Velazquez v. Nextphase, Inc.  
Action No.: 22-cv-7967 (CM)  
RR File No.: 12899-2

Colleen McMahon  
2/6/2023

Dear Honorable Colleen McMahon:

This office is local counsel for defendant Nextphase, Inc. ("Defendant") in the above-referenced matter. We write in response to the Court's notice (ECF #14) scheduling an initial conference on February 8, 2023, at 11:30 AM.

Both Michael Stanger, counsel for Defendant appearing *pro hac vice*, and I have conflicts on February 8, 2023, and respectfully ask that the Court adjourn the initial conference to a later date. Prior to submitting this letter request, I reached out to Plaintiff's counsel Mark Rozenberg regarding our scheduling conflict, and Mr. Rozenberg consented to our request provided that the initial conference is not scheduled in the afternoon of February 9, 2023 as he has a conflict then. The requested adjournment of the initial conference should not affect any other scheduled dates.

Accordingly, we respectfully request that the Court adjourn the initial conference scheduled for February 8, 2023.

Respectfully submitted,

RIVKIN RADLER LLP

s/ Lawrence S. Han

Lawrence S. Han